

1313 North Market Street P.O. Box 951 Wilmington, DE 19899-0951 302 984 6000

www.potteranderson.com

Richard L. Horwitz
Partner
Attorney at Law
rhorwitz@potteranderson.com
302 984-6027 Direct Phone
302 658-1192 Fax

September 20, 2007

VIA ELECTRONIC FILING

The Honorable Sue L. Robinson U.S. District Court J. Caleb Boggs Federal Building 844 N. King Street Wilmington, DE 19801

Re:

Oracle Corp. v. epicRealm Licensing, LP; C.A. No. 06-414-SLR OuinStreet, Inc. v. epicRealm Licensing, LP; C.A. No. 06-495-SLR

Dear Judge Robinson:

epicRealm writes this letter to briefly outline the discovery disputes between Oracle and epicRealm and QuinStreet and epicRealm in anticipation of this afternoon's hearing.

With respect to Oracle:

<u>Oracle's Response to Interrogatories.</u> Oracle has not provided full and complete interrogatory answers including its contentions of noninfringement.

Oracle's Production of Source Code. Oracle has not produced any source code for the accused products nor has Oracle produced Oracle's tools that would allow that source code to be efficiently analyzed.

With respect to QuinStreet:

<u>QuinStreet's Production of Documents.</u> As of September 14, 2007, the date document production was due, QuinStreet had not produced any requested documents that relate to any of the QuinStreet products at issue.

<u>QuinStreet's Response to Interrogatories.</u> QuinStreet has not provided full and complete interrogatory answers including its contentions of noninfringement.

The Honorable Sue L. Robinson
September 20, 2007
Page 2

QuinStreet's Failure to Produce Rule 30(b)(6) Witnesses. epicRealm served a notice of deposition under Rule 30(b)(6) directing to seeking identification of the QuinStreet products at issue and how they function. epicRealm asks for the production of a QuinStreet witness pursuant to epicRealm's Rule 30(b)(6) notice.

Respectfully,

/s/ Richard L. Horwitz

Richard L. Horwitz

RLH:nmt 820090/31393

cc: Clerk of Court (via hand delivery)

Counsel of Record (via efiling)